

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BANK OF AMERICA, N.A.,

Plaintiff,

v.

RHETT CAVIEL, MORGAN L.
JACKSON, HEWEN P. HUMPHREY,
III, MARTHA HUMPHREY McQUEEN,
HOMER HUMPHREY, LEO C.
HUMPHREY, FRANK HUMPHREY,
BARABARA J. HUMPHREY
ARMSTEAD, and THE UNKNOWN
HEIRS AT LAW OF ANTHONY R.
HUMPHREY, DECEASED,

Defendants.

United States Courts
Southern District of Texas
FILED

NOV 13 2023

Nathan Ochsner, Clerk of Court

Civil Action No. 4:22-cv-02747

CROSS-CLAIM OF LEO HUMPHREY AGAINST DEFENDANT RHETT CAVIEL

COMES NOW Leo Humphrey (“Cross-Complainant” or “Humphrey”) files this his Cross-Claim against Defendant Rhett Cavel and states as follows:

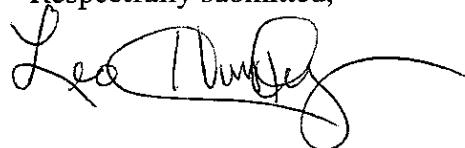
1.

WHEREFORE, PREMISES CONSIDERED, Cross-Complainant prays that this Court grant this Cross-Claim and enter judgment against Defendant Rhett Cavel;

a.

b. awarding Humphrey such other and further relief to which he may be entitled at law or in equity.

Respectfully submitted,



Response To: Civil Action No. 4:22-cv-02747

**Cross-Claim against Defendant Rhett Cavel
To Whom It May Concern:**

This matter of concern pertains to the two (2) acre tract of land purchased by Hewen 11 and Cora Humphrey. 1810 and 1820 Darst Road are portions of this two (2) acre tract of land. This two (2) acre tract of land was to become home sites for their children.

Lillian Humphrey Cavel, the mother of Rhett Cavel; was granted permission to build on one quarter (1/4) of an acre as was her portion, 1820 Darst Road.

Martha Humphrey McQueen was given one quarter (1/4) of an acre as her portion; 1810 Darst Road.

Therefore, Lillian's one quarter (1/4) acre, and Martha's one quarter (1/4) acre equals one half (1/2) acre specifically. This in actuality should exclude Lillian Humphrey Cavel, and Martha Humphrey McQueen from any ownership in the remaining one and one half (1 1/2) acres of property.

The remaining one and one half (1 1/2) acres are to be divided equally between the heirs of Hewen and Cora Humphrey as listed in the document. Therefore, Rhett Cavel is not entitled to any portion of the remaining one and one half (1 1/2) acres of family property. This should be legal and upheld by the courts of law.

I reiterate, Rhett Cavel has no legal right to any portion of the remaining one and one half (1 1/2) acres of the family estate. To grant Rhett any portion of the remaining 1 1/2 acres of the Humphrey estate is to steal the Birth-Right, and the Inheritance of Hewen and Cora Humphreys remaining children.

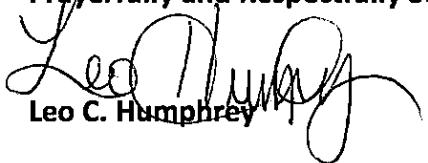
A, or part 2 of this document:

I pray that your judgment is considered prayerfully, legally, empathetically, and ethically binding as you consider settling this portion of the matter.

Rhett has collected three hundred dollars (\$300.00) per month for thirty nine (39) months as I submit this response. Without a doubt, I am sure he will collect another three hundred dollars (\$300.00) for this month of November to make a total of forty (40) months. This money is being collected from the family that purchased the home at 1810 Darst; The Luna Family. These forty months of money totaling \$12,000.00, Rhett should be forced by the courts to reimburse to the family estate, or to the Luna Family. The well that Rhett is collecting money on has nothing to do with Lillian's house at 1820 Darst Rd. It is not close. This well supplies water to 1810 Darst Rd, and is in close proximity thereto. Rhett has no legal right to anything pertaining to the one and one half (1 1/2) portion of the Family estate.

As I prayerfully provide the true picture of this family ordeal, I further pray that whomsoever review this matter, and execute judgment over this case truly believe in upholding right, standing up for justice, and hold Rhett accountable for his unlawful, crooked, and scheming ways. To rule in Rhett's favor is to make you an accessory to his unlawful demeanor.

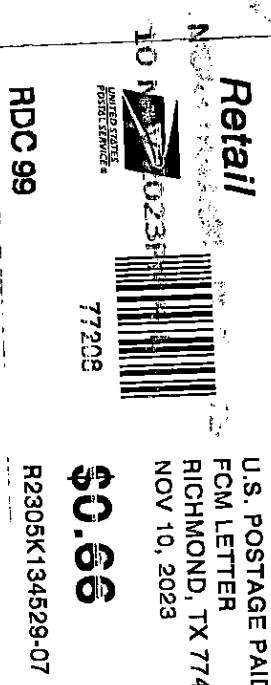
Prayerfully and Respectfully Submitted



Leo C. Humphrey

A handwritten signature in black ink, appearing to read "Leo C. Humphrey".

Leo C. Humphrey
1901 Arborway Hill Ln.
Richmond, TX 77469



Nathan Ochsner
Clerk of Court
P.O. Box 61010
Houston, TX 77208